

WRITER'S DIRECT DIAL NO.  
**(424) 652-7814**

WRITER'S INTERNET ADDRESS  
**bklein@bakermarquart.com**

February 12, 2020

By ECF

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Sohrab Sharma and Robert Farkas  
CR 18-340-LGS

Dear Judge Schofield:

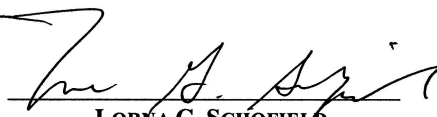
Counsel for defendants Robert Farkas and Sohrab Sharma write to request the following unopposed and slight extension of the briefing schedule tied to the government's pending motion to compel regarding "presence of counsel" defense, setting the new due date as follows:

- Defense response due on February 21, 2020

The government does not oppose this extension. The existing schedule was set on February 11, 2020, when the Court issued an order requiring the defense response to be due by this coming Monday, February 17, which is a federal holiday. (Dkt. No. 266.) The government filed its motion to compel on February 10, 2020. (Dkt. Not. 265.) Before filing its motion, the government did not consult with defense counsel about a briefing schedule, but after the Court set the response date, the parties conferred about the proposed new date. The defense requests the four days of additional time because the government's motion to compel poses novel legal issues (as the motion implicitly acknowledges) and because Monday is a federal holiday.

Application GRANTED. The deadline for Defendants to file a response to the Government's motion to compel Defendants to disclose before trial whether they intend to assert a "presence of counsel" defense is hereby extended from February 17, 2020, to February 21, 2020. SO ORDERED.

Dated: February 13, 2020  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

For all the above reasons, we request that the Court grant the proposed short extension of the briefing schedule.

Respectfully submitted,

/s/ Brian E. Klein

Brian E. Klein

Baker Marquart LLP

-and-

Paul D. Petruzzi

Law Offices of Paul D. Petruzzi PA

-and-

Sanford N. Talkin

Talkin, Muccigrosso & Roberts LLP

*Attorneys for Robert Farkas*

/s/ Gennaro Cariglio Jr.

Gennaro Cariglio Jr. P.L.

-and-

Grant P. Fondo (*admitted pro hac vice*)

Melissa Lee Brumer

Goodwin Procter LLP

-and-

Denis P. Kelleher, Jr.

Talkin, Muccigrosso & Roberts LLP

*Attorneys for Sohrab Sharma*